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June 22, 2021

Honorable Andrew L. Carter, Jr.  
US District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007  
[ALCarterNYSDChambers@nysd.uscourts.gov](mailto:ALCarterNYSDChambers@nysd.uscourts.gov)

Re: US v. Ronald Romano, 1:20-cr-00585-ALC  
Defendant's Request to Adjourn the 6/24/2021 Status Conference

Dear Judge Carter,

I represent Ronald Romano. A status conference by telephone is scheduled for this Thursday, June 24, 2021, at 12:30 PM. Respectfully, it is requested that this conference be adjourned for a period of sixty days. Such an adjournment period is necessary for the defendant to continue a review of the voluminous number of emails, electronic correspondence, and other documents produced in discovery, consisting of millions of pages. AUSA Nicholas Chiuchiolo, in a separate writing, has stated that the Government has no objection to this adjournment request.

As this is a defense request, the period of adjournment should not be charged to the Government under the Speedy Trial Act 18 USC 3161 (h)(7)(A). It is respectfully submitted that granting this request for an adjournment for the reasons herein serve the ends of justice, and without such adjournment, the undersigned would not have an adequate opportunity to meaningfully review the discovery materials provided by the Government and effectively prepare, which could result in a miscarriage of justice. 18 USC 3161(h)(7)(B)(i), (iv).

Your Honor's consideration to this request is greatly appreciated.

Respectfully submitted,

/S/

Mark A. Macron

cc: [Nicholas.Chiuchiolo@usdoj.gov](mailto:Nicholas.Chiuchiolo@usdoj.gov); [Timothy.Capozzi@usdoj.gov](mailto:Timothy.Capozzi@usdoj.gov)